

EXHIBIT O

PAULA LUDWIG Confidential
THE BASU GROUP vs SEVENTH AVENUE

November 18, 2016
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1 is that, 3378?

2 A. That came on the photo, so that would either be Manju's
3 or Shankar's.

4 Q. Okay. Do you know what the meaning of the numbers at
5 the bottom right are?

6 A. No.

7 Q. So you don't have any knowledge of what those numbers
8 are?

9 A. Nope.

10 Q. Can you guess at what those numbers are?

11 A. It looks to me like it's a date, August 10, 2012.

12 Q. Would you-- from working with Manju and her company in
13 the past, would you have any-- what would those numbers
14 mean to you? What would that date mean to you? Would
15 it be a production date, first time they ever made the
16 bag?

17 A. It means nothing to me. It's a number on an image.

18 Q. Okay. Put those away.

19 (Exhibit No. P15 and P16 were marked for
20 identification.)

21 BY MR. GILMAN:

22 Q. While Ms. Ludwig is looking at those, P15 starts with
23 SA000409, and P16 starts at SA000413. Let me know when
24 you're ready.

25 A. I'm ready.



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1 Q. Have you ever seen these documents before?

2 A. These are e-mails.

3 Q. Again, do you recall producing these e-mails or was it
4 Legal?

5 A. Probably a combination of both. I would have sent them
6 anything I had.

7 Q. Can you now describe for the record what these e-mails
8 are saying to you?

9 A. Well, Exhibit P15 is an e-mail from Manju on September
10 17, 2003, "Dear Paula, I'm sending you some digitals
11 here to confirm our understanding if that the below
12 designs are considered with feather. If she likes
13 these, we can re-color them and remake sample.
14 Regards, Manju." Then there's not a date for the
15 response, but Tisha had responded stating that she,
16 "Removed Manju, no peacock feathers. Pretty sure that
17 was one of the ones in questioning from Basu. I'm in
18 Chicago but can look for images when I return. I guess
19 they wouldn't know southwestern. It's like stating the
20 other Indians. That's why I always ask feather or
21 dot. Maybe a dreamcatcher or something. Just tell her
22 I'm out and we will respond Friday. Okay?"

23 Q. And we discussed earlier you had mentioned a
24 conversation or an e-mail from Tisha while she was away
25 that maybe discussing it with her afterwards?

1 A.

2 Q.

4 A.

6 Q.

16 Q.

17 A.

18 Q.

20 A.

21 Q.

23 A.

25 Q.



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*** CONFIDENTIAL ***

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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		:	
THE BASU GROUP, INC.,	:		
	:		
Plaintiff,	:	Civil Action No.:	
	:	16-cv-00461-PGG	
	:	ECF CASE	
vs.	:		
	:		
SEVENTH AVENUE, INC.,	:		
	:		
Defendant.	:		
			X

Deposition of PAULA LUDWIG

Friday, November 18, 2016

10:15 a.m.

At

Seventh Avenue, Inc.
1112 7th Avenue
Monroe, Wisconsin 53566

Reported by Sheila K. Fairchild

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DEPOSITION of PAULA LUDWIG, a witness in the
above-entitled action, was taken at the instance of the
Plaintiff, under and pursuant to the Rule 30 (b) (6),
Federal Rules of Civil Procedure, pursuant to notice,
before me, SHEILA K. FAIRCHILD, Professional Court
Reporter and Notary Public, in and for the State of
Wisconsin, at the offices of Seventh Avenue, Inc., 1112
7th Avenue, Monroe, Wisconsin, on the 18th day of
November, 2016, commencing at 10:15 a.m. and concluding
at 2:10 p.m.

APPEARANCES:

MYERS WOLIN, LLC

MICHAEL R. GILMAN

100 Headquarters Plaza

Morristown, New Jersey 07960

Appeared on behalf of the Plaintiff.

LADAS & PARKY, LLP

DAVID C. BREZINA

224 South Michigan Avenue, Suite 1600

Chicago, Illinois 60604

Appeared on behalf of the Defendant.



8, 2016
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COLONY BRANDS ASSOCIATE GENERAL COUNSEL

TIMOTHY ENGLING

1112 7th Avenue

Monroe, Wisconsin 53566-1364

appeared on behalf of the Defendant.

ALSO PRESENT: Russell Davis, President Seventh Avenue,
Inc.